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Attorney for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:19-cr-00300-04-JCM-EJY

Plaintiff,

VS.

MARLON ECHON MELU,

Defendant.

**SEALED STIPULATION AND ORDER
TO CONTINUE SENTENCING
HEARING (Eight Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between the UNITED STATES OF AMERICA, by and through Assistant United States Attorney Simon F. Kung, and defendant MARLON ECHON MELU, by and through his attorney, Richard E. Tanasi, Esq., that the **Sentencing Hearing** in the above-captioned matter, now scheduled for **September 23, 2022, at the hour of 10:00 a.m.**, be vacated and continued to a time convenient for the Court **after December 5, 2022.**

Pursuant to General Order No. 2007-04, this Stipulation is entered into for the following reasons:

1. On July 29, 2022, the Court continued the jury trial date for those defendants who have not entered a guilty plea (“trial defendants”) to December 5, 2022.

2. Mr. Melu is a government witness, and he continues to cooperate and assist the government in its case against the trial defendants.

1 3. The parties require additional time for Mr. Melu to continue his cooperation,
2 which may include his potential testimony against the trial defendants as part of his continuous
3 cooperation and assistance to the government.

4 4. Mr. Melu is out of custody and does not object to this continuance.

5 5. The additional time requested herein is not sought for purposes of delay. Thus,
6 denial of this request for continuance could result in a miscarriage of justice.

7 **WHEREFORE**, the parties respectfully request that this Honorable Court accept this
8 Stipulation and enter an Order as set forth below, continuing the sentencing hearing to a date
9 after December 5, 2022, as may be deemed convenient to the Court.

10 DATED this 1st day of August 2022.

11
12 U.S. ATTORNEY'S OFFICE

13 /s/ Simon F.Kung
14 SIMON F. KUNG
15 Assistant United States Attorney
16 501 Las Vegas Blvd. South, Ste. 1100
17 Las Vegas, NV 89101
18 simon.kung@usdoj.gov
19 Attorney for Plaintiff

20 /s/ Richard Tanasi
21 RICHARD E. TANASI
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25 Attorney for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
MARLON ECHON MELU,
Defendant.

| Case No. 2:19-cr-00300-04-JCM-EJY

SEALED ORDER ON STIPULATION

This matter coming before the Court on Stipulation to Continue Sentencing Hearing, the Court having considered the matter, and good cause showing, the Court accepts the Stipulation.

WHEREFORE, IT IS HEREBY ORDERED, that the Sentencing Hearing in the above-captioned matter, now scheduled for September 23, 2022, at the hour of 10:00 a.m., be vacated and continued to **December 7, 2022, at 10:30 a.m.**

DATED August 2, 2022.

UNITED STATES DISTRICT JUDGE

TANASI LAW OFFICES
8716 Spanish Ridge Ave., Ste. 105
Las Vegas, Nevada 89148

CERTIFICATE OF ELECTRONIC SERVICE

I HEREBY CERTIFY that I am an employee of Tanasi Law Offices, that on this 1st day of August 2022, I served a true and correct copy the foregoing **STIPULATION AND ORDER** by U.S. District Court CM/EMF Electronic Filing to:

SIMON F. KUNG
Assistant United States Attorney
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Las Vegas, NV 89101
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Attorney for Plaintiff

/s/ Richard Tanasi
RICHARD TANASI, ESQ.

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